



July 15, 2025

Nunavut Impact Review Board
P.O. Box 1360,
Cambridge Bay, NU
X0B 0C0

NIRB File No.: 24XN038
NPC File No.: 150467

Attention: Kelli Gillard, Senior Impact Assessment Officer

Re: *Draft Scope List and Draft Impact Statement Guidelines for the West Kitikmeot Resources Corp.'s "Grays Bay Road and Port" Project Proposal*

Dear Ms. Gillard,

Thank you for the opportunity to provide input on whether the listing and description of proposed Project components and activities, as outlined in the *Draft* Scope List of the Project Proposal, are accurate or whether any specific inclusions or exclusions should be considered. Additionally, we appreciate the opportunity to offer comments and suggested revisions to the *Draft* Impact Statement Guidelines for your consideration.

As requested by the Nunavut Impact and Review Board (NIRB), West Kitikmeot Resources (WKR) has reviewed the *Draft* Scope List and the *Draft* Impact Statement Guidelines and submits the attached table outlining our comments and suggested revisions to both documents.

In addition to the attached table, WKR would like to address two topics identified within the *Draft* Impact Statement Guidelines, specifically the references to **Mining** and **Shipping** throughout that require clarification.

WKR would like to clarify that this Project is not a mine, but rather permanent transportation infrastructure. WKR requests that references to mine-related infrastructure and activities noted throughout the *Draft* Impact Statement Guidelines be removed.

Furthermore, WKR would like to clarify the scope of the effects assessment associated with shipping activities. The effects assessment for Project-level activities (construction and operations of the port by WKR) is focused only on the approach to the Port. Shipping activities outside of this focus, including those conducted by third-party users to utilize Project infrastructure, such as shipping concentrate from future mines, are outside the scope of the Project-level effects assessment, but will be addressed within the cumulative effects assessment of WKR's Impact Statement.

We thank you for the opportunity to provide feedback and look forward to the ongoing discussion on the Grays Bay Road and Port Project.

Yours truly,



Gavin Law
Manager, Environment
West Kitikmeot Resources Corp.

Cc: Elliot Holland, Chief Operating Officer, West Kitikmeot Resources Corp.
Kassidy Koaha-Laube, Community Engagement Coordinator, West Kitikmeot Resources Corp.
Kelli Gillard, Manager, Impact Assessment, Nunavut Impact Review Board
Leila Cai, Impact Assessment Officer, Nunavut Impact Review Board

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Draft Scope List					
Scope of the Project 2.1.a. Bullet 8	2	The Draft Scope document references 'Marine aids to navigation'	Revise text to “Navigational infrastructure and aids”...	Navigational infrastructure and aids for both marine and air travel may be required.	
Scope of the Project 2.1.b. Bullet 7	2	"The Draft Scope document references 'Two (2) tugs providing berthing assistance to vessels'	Suggested revisions to 'Tug pens for berthing assistance to vessels'	More than two tugs may be required.	
Scope of the Project 2.2.a. Bullet 5	2	The Draft Scope document references 'Approximately 230 water crossings, including bridges and culverts'	Suggest removal of the number of crossings.	The number of crossings is expected to change as the design advances.	
Scope of the Project 2.3.b. Bullet	2	The Draft Scope document references 'vehicle parking areas, office, weather station'	Suggested revision to 'vehicle parking areas, office, weather station, and refuge station'.		
Scope of the Assessment	3	<p>The <i>Draft Scope</i> document references ‘Inuit Qaujimaningit’, but not other relevant terms (e.g. ‘Inuit Qaujimajatuqangit’, ‘Inuit Knowledge’).</p> <p>Furthermore, the <i>Draft IS Guidelines</i> reference the term ‘Inuit Qaujimajatuqangit’ instead, which creates confusion.</p>	Consistency, and additional clarity/specificity on this topic is requested. Furthermore, the proposed term does not address regional (i.e. western Kitikmeot) preferences that have been shared with WKR for use of the term ‘Inuit Knowledge’ over ‘IQ’.	The most recent <i>Draft NIRB Inuit Qaujimajatuqangit Guidance Document</i> (Draft 6, Revised March 11, 2025) does a better job of addressing this issue.	
Draft Guidelines					
Various	Various	Various references are made to the ‘mine’ and associated mining activities/infrastructure in the Draft IS Guidelines. However, the Project is not a mine development project; it is a proposed road and port.	Please revise language throughout document and remove unnecessary references to mine infrastructure and development activities.	Project is not a mine development project; it is a proposed road and port.	
1.1	3	The proposed definition of Inuit Qaujimajatuqangit lacks clarity	Additional clarity and specificity on this topic is requested.	The proposed definition does not address regional (i.e., western Kitikmeot) preferences	

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		and instead provides a list of examples (drawn from the Qikiqtaaluk Region, notably) of what IQ may include, address, or refer to. The proposed definition also differs considerably from past definitions used by NIRB, the GN, and other northern agencies and organizations. In addition, no reference is made to Inuit Qaujimaningit (which is referenced in the Draft Scope List, and how that term relates to/differs from Inuit Qaujimajatuqangit.		that have been shared with WKR for use of the term ‘Inuit Knowledge’ over ‘IQ’. The most recent <i>Draft NIRB Inuit Qaujimajatuqangit Guidance Document</i> (Draft 6, Revised March 11, 2025) does a better job of addressing this issue.	
2.1 2.1 2.1.2 7.4	9 10 12 36	The <i>Draft IS Guidelines</i> suggest an impact assessment on ‘systems’ or ‘collective impacts’ must now occur. This represents a substantial change to current practice and would likely add considerable complexity to an EA. To our knowledge this type of analysis would be new to Nunavut EA and is not a common or widely practiced approach in international EA. Furthermore, NIRB has offered no detailed guidance on how it should be properly done or examples of it being used effectively in a northern EA context.	WKR suggests removing the requirement for an impact analysis on systems from the IS Guidelines. If it is to be included, this should only occur after: 1) an appropriate, comprehensive rationale for its inclusion has first been provided by NIRB based on relevant Project-specific considerations; 2) an appropriate scale and scope for the system assessment(s) has been defined by NIRB, in advance; and 3) additional assessment guidance on this topic is provided in addition to examples of good practice in this area from comparable EA jurisdictions.	Systems analysis can also be heavily based in theory, and our overall knowledge of socio-ecological systems and their interactions often remains limited; this has the potential to add considerable complexity and uncertainty (i.e. time, cost, conflict) to the EA process. It may also create the potential for greater conflict and disagreement amongst stakeholders (e.g. How do you define the ‘system’ and what does it include? What happens when a proponent and the public, or communities, cannot agree on what a ‘system’ consists of? What scale and scope should be used in the analysis? How do you know if/how different parts of the system will affect other parts? How are the social and environmental systems connected and intertwined? What impacts will occur in different parts of the system, through which pathways, and will they be significant? Is one	

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				‘overarching’ systems assessment to be conducted? Or will multiple systems assessments be required?).	
2.1.1	11	While the four bullets describe certain protocols for the use of IQ, they do not necessarily apply to <u>all</u> uses or integrations of IQ into an Impact Statement (e.g. IQ that is already in the public domain or is already available in public reports, etc.). In addition, the valuable role of the NIRB process itself in addressing these matters is not mentioned.	<p>Suggested revisions (<u>in bold underline</u>):</p> <p>‘The Proponent is advised to engage with potentially affected communities, including knowledge holders, local organizations; designated Inuit organizations; Indigenous groups; governments or organizations; and interested individuals when developing acceptable methods of analyzing and presenting shared information. <u>Where appropriate</u>, the Proponent shall show evidence that:’</p> <p>...</p> <p><u>‘For greater clarity, the NIRB process itself (e.g. through public review and commenting periods) can also help fulfill these expectations pertaining to the use and integration of IQ.’</u></p>		
6.5	27	Re: Use of ‘...remote FutureSmart technology’.	Please remove reference to this.	This is not part of WKR’s proposal; this refers to a different project being assessed by NIRB (i.e., DeBeers’ Chidliak Project).	
7.4.1	37	Re: ‘Significance determinations shall be informed with input by potentially impacted communities and are not limited to only residual impacts.’	Please clarify or adjust statement.	This statement is unclear and is not aligned with common impact assessment practice (i.e., significance is typically only assessed where adverse residual impacts are likely).	
7.4.7	53	Re: ‘Baffin Island’.	Please remove reference to this.	The Project is not located on Baffin Island.	

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8.1.1.2 Air Quality Impact Assessment	55	Fugitive dust and gaseous emissions from construction activities and land clearing, extraction and ore processing, handling, tailings, waste rock and ore stockpiling, quarries and other Project components and works; and..	Revise statement to “Fugitive dust and gaseous emissions from construction activities and land clearing, quarries and other Project components and works; and	The Project is not a mine.	
8.1.1.2 Air Quality Impact Assessment	55	"Fugitive dust emissions from ground transportation and wind erosion at various Project components, including the all-weather road, access roads and mine hauling roads."	Revise statement to: "Fugitive dust emissions from ground transportation and wind erosion at various Project components, including the all-weather road and access roads."	The Project is not a mine.	
8.1.2 Climate & Meteorology 8.1.2.1 Baseline Information	56	ii. Meteorological data including, but not limited to, air temperature, precipitation, wind directions and velocity, as well as prevailing wind directions for locations of proposed project components and along proposed shipping route(s);	Remove reference to proposed shipping routes and focus on the "approach to the Port" at the threshold for Air Quality influence from the Project.	The Project will include shipping to deliver construction materials and equipment; shipping will be limited in scale to levels similar to existing community resupply operations in the Coronation Gulf. As a result, Project activities and influence on air quality is limited to the area in the vicinity of the Port. Activities conducted by third-party users to utilize Project infrastructure, such as shipping concentrate from future mines, are outside the scope of the Project.	
8.1.3 Noise and Vibration 8.1.3.1	56	Review of available studies/research the potential impacts of noise and vibrations on wildlife behaviours and health in both terrestrial and marine environments, with a focus on noise from similar mining and shipping operations, in comparable climate and geographical regions if possible. Emphasis should be placed on level of	Revise statement to “..with a focus on noise from similar road and shipping operations,...”	The Project is not a mine and noise impacts for mining will only be assessed as necessary in the cumulative effects assessment.	

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		noise and the identification of noise sensitive species, timing, etc.; and			
8.1.3.2 Noise and Vibration Impact Assessment	57	<p>"Ground transportation, including mine traffic, other access roads and the public where applicable"</p> <p>"Equipment use at mine and construction sites, including power generators; and"</p> <p>"Mine site operations including: blasting; drilling; dense media separation; tailings; transportation, and stockpiling activities"</p>	Remove references to mine related language.	The Project is not a mine.	
8.1.4 Terrestrial Environment 8.1.4.2 Impact Assessment	57, 58	Specific mentions / inclusions of mine related components for evaluation of impacts.	Remove references to mine related language.	The Project is not a mine.	
8.1.5 Geological Features, Surficial and Bedrock Geology and Geochemistry 8.1.5.1 Baseline Information	59, 60	Structural geology baseline related to mining baseline as opposed to surface related infrastructure.	Remove expectations on level of structural geology that will be completed.	The Project does not include any deep excavation or deep structural components, so there is no need to characterize structural geology.	
8.1.6 Hydrological Features and Hydrogeology 8.1.6.1 Baseline Information	60	A conceptual and numerical hydrogeological model that discusses the hydro stratigraphy and groundwater flow systems should be presented;	Remove requirements for hydrogeological modelling as it is related to deep excavation.	The Project does not include any deep excavation or deep structural components, so there is no need for hydrogeological modelling.	

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8.1.6.2 Impact Assessment	61	Potential impacts to natural drainage patterns from the construction and operation of proposed mine facilities and Project infrastructure;	Remove reference to mine facilities.	The Project is not a mine.	
8.1.7 Groundwater and Surface water Quality	61, 62	Potential impact of ongoing exploration activities on surface water quality from drilling water withdrawals and returns; and	Remove this clause as it is related to mineral / mine projects.	The Project is not a mine and as a result will not include exploration activities.	
8.1.9 Freshwater Aquatic Environment	64	For the purpose of the current Guidelines, freshwater aquatic environment includes aquatic ecology, aquatic biota (including fish as defined in the Fisheries Act (2019), benthic invertebrates, and other aquatic organisms) and habitat including fish habitat as defined in the Fisheries Act.	Remove reference to benthic invertebrates, and other aquatic organisms.	As there is no mine associated with the Project, there is no expectation of effluent discharge to freshwater waterbodies, and therefore no need to characterize benthic invertebrates/aquatic macrophytes in the baseline or assessment.	
8.1.9.1 Baseline Information	65	ii. Description of the biological composition of freshwater aquatic environments in the Local Study Area, including: trophic state, periphyton, phytoplankton, zooplankton, benthic invertebrates, fish, and the interactions and relative significance of each trophic level identified in the food chain;	Remove requirement to describe trophic state, periphyton, phytoplankton, zooplankton, benthic invertebrates, fish, and the interactions and relative significance of each trophic level identified in the food chain.	As there is no mine associated with the Project, there is no expectation effluent discharge to freshwater waterbodies, and therefore no need to characterize trophic state, periphyton, phytoplankton, zooplankton, benthic invertebrates and the interactions and relative significance of each trophic level identified in the food chain.	
8.1.12 Birds and Bird Habitat 8.1.12.1 Baseline Information	70	ii. Description of current habitat use by VECs, including the use of Migratory Bird Sanctuaries, Key Migratory Bird Sites, Territorial Parks and other important habitats (e.g., breeding, nesting sites, staging areas) in the Regional Study Area and along the proposed shipping routes;	Remove reference to proposed shipping routes and focus on the "approach to the Port" at the threshold for birds and bird habitat influence from the Project.	The Project will only include shipping for construction support vessels and 1 annual resupply sealift and barge during operations. As a result, Project activities and influence on key migratory bird sites are limited to the area in the vicinity of the Port. Activities conducted by third-party users to utilize the Project infrastructure, such as shipping	

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				concentrate from future mines, are outside the scope of the Project.	
8.1.12.1 Baseline Information	70	v. Identification of key migratory bird sites along the shipping route, including those which could potentially be affected by marine spills as a result of current and/or wind patterns.	Remove reference to proposed shipping routes and focus on the "approach to the Port" at the threshold for birds and bird habitat influence from the Project.	The Project will only include shipping for construction support vessels and 1 annual resupply sealift and barge during operations. As a result, Project activities and influence on key migratory bird sites are limited to the area in the vicinity of the Port. Activities conducted by third-party users to utilize the Project infrastructure, such as shipping concentrate from future mines, are outside the scope of the Project.	
8.1.14 Marine Wildlife 8.1.14.2 Impact Assessment	73	Impact analysis that gives consideration to the potential for Project shipping activities to impact the marine wildlife. The Proponent shall, where any impact to marine wildlife is identified, indicate the cultural or practical importance of that species to northerners. In addition, the analysis includes the following:	Remove reference to proposed shipping routes and focus on the "approach to the Port" at the threshold for marine wildlife influence from the Project.	The Project will only include shipping for construction support vessels and 1 annual resupply sealift and barge during operations. As a result, Project activities and influence on marine wildlife are limited to the area in the vicinity of the Port. Activities conducted by third-party users to utilize the Project infrastructure, such as shipping concentrate from future mines, are outside the scope of the Project.	
8.2.6.1 Traditional Activity and Knowledge Baseline Information	78	Re: 'Description of known non-traditional land and resource use including protected areas, visual and aesthetic resources'	Relocate this statement instead to Section 8.2.7 (Non-traditional Land Use and Resource Use).	This statement appears to be in the wrong section.	

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8.2.7.1 Non-Traditional Activity and Knowledge Baseline Information	79	Re: ‘Description of current and traditional land use areas and the importance of those areas to Inuit culture and social well-being’	Relocate this statement instead to Section 8.2.6 (Traditional Activity and Knowledge).	This statement appears to be in the wrong section.	
9.0 Public Engagement	86	Re: ‘... and how the Proponent verified its use and interpretation of the knowledge shared/collected’	Suggested revisions (<u>in bold underline</u>): ‘... and how the Proponent verified its use and interpretation of the knowledge shared/collected <u>if appropriate</u> ’	Not all knowledge or information will necessarily require verification.	
10.0 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge	90	Re: ‘This highlights the importance of Proponents verifying and validating that the information and knowledge shared through Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge has been interpreted and packaged in such a way that it adequately and accurately reflects the intent of what was shared. This includes verifying and validating that any pre-existing information and knowledge used is appropriate and applies.’	Suggested revisions (<u>in bold underline</u>): ‘This highlights the importance of Proponents verifying and validating that the information and knowledge shared through Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge has been interpreted and packaged in such a way that it adequately and accurately reflects the intent of what was shared. <u>However, the process of verifying and validating will necessarily vary depending on the type or scope of information being presented. For example, new/primary IQ studies may necessitate in-person follow-up feedback sessions with key knowledge holders to do so. Conversely, verifying and validating straightforward community engagement results or</u> that any pre-existing (<u>e.g. already publicly available</u>) information and knowledge used is appropriate and applies <u>may not be necessary or occur through simpler means (e.g. through NIRB’s</u>	This statement implies the process of verifying and validating is universal and will <i>not</i> vary depending on the type or scope of IQ and other information being used.	

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			<u>existing public review and commenting processes).</u>		
10.1 Methods for Gathering Inuit Qaujimagatuqangit, Indigenous Knowledge, and Community Knowledge	91	Re: ‘Before Proponents present Inuit Qaujimagatuqangit in public forums or in their submissions to the NIRB, it is expected that all contributions of Inuit Qaujimagatuqangit be verified with Inuit communities to ensure that it was appropriately and accurately documented, analyzed/interpreted, used, and disclosed.’	Suggested revisions (<u>in bold underline</u>): ‘Before Proponents present Inuit Qaujimagatuqangit in public forums or in their <u>final</u> submissions to the NIRB, it is expected that all contributions of Inuit Qaujimagatuqangit <u>documented through new/primary research studies</u> be verified with Inuit communities to ensure that it was appropriately and accurately documented, analyzed/interpreted, used, and disclosed, <u>where appropriate.</u> ’	Stating that ‘all’ contributions be verified is an overly restrictive blanket requirement that may be unworkable. For example, long-term IQ studies may go through several drafts and stakeholder reviews. In addition, pre-existing information and knowledge may already be in the public domain, be substantial in quantity, and/or have previously been verified by stakeholders.	
10.1 Methods for Gathering Inuit Qaujimagatuqangit, Indigenous Knowledge, and Community Knowledge	91	Re: ‘While the NIRB process (e.g., through public hearing and commenting periods) can also play a role in helping achieve this objective in a non-proponent led forum, this should not be the only verification mechanism.’	Suggested revisions (<u>in bold underline</u>): ‘While the NIRB process (e.g., through public hearing and commenting periods) can also play a role in helping achieve this objective in a non-proponent led forum, this should not be the only verification mechanism <u>used in more complex, primary IQ studies.</u> ’	In some instances, the NIRB process may actually be an appropriate forum for this (e.g. in simple or straightforward cases involving review of pre-existing/ publicly available information). In other cases it may be the <u>only</u> forum where it can occur (e.g. when a Knowledge Holder orally shares information/knowledge <i>directly in</i> a NIRB public hearing).	
10.1 Methods for Gathering Inuit Qaujimagatuqangit, Indigenous Knowledge, and Community Knowledge	91	Re: ‘Where the Proponent seeks to rely on previously documented Inuit Qaujimagatuqangit, Indigenous Knowledge and Community Knowledge, it must show evidence that it engaged with affected groups to determine the relevance and limitations of that information in relation to the assessment of current	Please revise statement. For example, the following might be included instead: ‘ <u>Acknowledging this information is already in the public domain and may have underwent its own verification processes previously, publicly available IQ will typically not be subject to the same levels of verification/validation as new/primary IQ research and, in some instances,</u>	This text appears to suggest publicly available information be subject to the same level of approval and verification scrutiny as any new primary IQ research that is conducted. However, such an approach fails to recognize the already public nature of this information, the large quantities of public information that may exist (making comprehensive verification unrealistic), and the impracticability of	

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		conditions, changes over time, and potential project effects.’	<u>verification/validation may not be required. In instances where publicly available IQ could benefit from further input by Inuit (e.g. high-level confirmation the information remains applicable to the current context and project), this may occur through the NIRB process itself (e.g. through public commenting and review phases) or through general reviews conducted by RIAs or other appropriate representative bodies (e.g. Inuit advisory groups). Ideally, this would occur prior to the submission of any final Impact Statement documents to NIRB.</u>	obtaining similar levels of approval and verification (e.g. What if certain Knowledge Holders have since passed away or are otherwise unavailable/unwilling to participate?). Furthermore, this approach does not appear to treat different knowledge types with equal requirements (consider that proponents often cite western science peer-reviewed journal articles in their Impact Statement; NIRB wouldn’t expect proponents to initiate <i>another</i> peer review process for each journal article cited, so why should this occur in other instances?). IQ that is already in the public domain (e.g. books, journal articles, reports and studies), or that is freely shared by a Knowledge Holder in a public setting (e.g. in a public hearing or meeting), should thus not be subject to similar levels of approval, verification, or confidentiality considerations as other forms of primary IQ research.	
10.2 Details and Outcomes	92	Re: ‘How Inuit- Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge-related knowledge and conclusions were verified prior to their inclusion in the impact statement.’	Suggested revisions (<u>in bold underline</u>): ‘How Inuit- Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge-related knowledge and conclusions were verified prior to their inclusion in the impact statement, <u>where appropriate.</u> ’	See above comments.	
10.2 Details and Outcomes	93	Re: ‘Proponents should demonstrate that they have the permission of Knowledge holders to gather and apply	Suggested revisions (<u>in bold underline</u>):	See above comments.	

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		the knowledge shared for the development of the Impact Statement.’	‘ <u>For any new primary IQ research conducted,</u> proponents should demonstrate that they have the permission of Knowledge holders to gather and apply the knowledge shared for the development of the Impact Statement.’		
11.3 Monitoring and Mitigation Plans	96	Re: ‘... and what Inuit Qaujimajatuqangit-informed and Inuit-led monitoring it is committed to in relation to the project’	Suggested revisions (<u>in bold underline</u>): ‘... and what Inuit Qaujimajatuqangit-informed and Inuit-led monitoring <u>may be</u> committed to in relation to the project, <u>if appropriate</u> ’	Inuit-led monitoring is not a blanket requirement, nor may it be applicable in all instances.	
11.3.1 Follow-up and Adaptive Management Plans	96	Re: ‘The monitoring design must include a statistical evaluation of the adequacy of the historical background and current baseline data to provide a benchmark for testing project effects, and the need for any additional pre-construction or pre-operational monitoring to establish a firmer project baseline.’	Suggested revisions (<u>in bold underline</u>): ‘ <u>For some environmental monitoring plans,</u> the monitoring design must include a statistical evaluation of the adequacy of the historical background and current baseline data to provide a benchmark for testing project effects, and the need for any additional pre-construction or pre-operational monitoring to establish a firmer project baseline.’	This approach is not appropriate for all types of monitoring (e.g. socio-economic monitoring).	
11.3.1 Follow-up and Adaptive Management Plans	97	Re: ‘Identification of the quantitative triggers or thresholds that would indicate the need to alter or vary the management plan or mitigation measures’	Suggested revisions (<u>in bold underline</u>): ‘Identification of the quantitative <u>and/or qualitative</u> triggers or thresholds that would indicate the need to alter or vary the management plan or mitigation measures’	Qualitative information may also be used in socio-economic assessment and monitoring.	
11.3.3 Socio-Economic Environmental Plans	98	Re: ‘The proponent will include steps and plans describing training programs and opportunities for Inuit, and how Inuit Owned Firms will receive preference in contracts relating to the construction and all phases of the	Suggested revisions (<u>in bold underline</u>): ‘ <u>Where appropriate,</u> the proponent will include steps and plans describing training programs and opportunities for Inuit, and how Inuit Owned Firms <u>may</u> receive preference in contracts	This language is currently too prescriptive and may not be applicable in all instances or project phases.	

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		project in the Environmental Impact Statements.’	relating to the construction and all phases of the project in the Environmental Impact Statements.’		
11.3.3 Socio-Economic Environmental Plans	98	Re: ‘Where secondary data does not exist for VSEC indicators, primary data collection will be required.’	Suggested revisions (<u>in bold underline</u>): ‘Where secondary data does not exist for VSEC indicators, primary data collection <u>may</u> be required, <u>or other forms of pertinent information may be used (e.g. qualitative information from sources including community engagement)</u> .’	This language is currently too prescriptive and may not be appropriate in all instances.	